

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN  
GROUP” and/or “CYPHERIAN”; THEIA  
AVIATION, LLC; and THEIA HOLDINGS  
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**NOTICE OF EXPEDITED MOTION OF RECEIVER FOR AN ORDER  
FURTHER EXTENDING THE STAY PROVIDED IN THE RECEIVERSHIP ORDER**

**PLEASE TAKE NOTICE** that, upon the accompanying *Memorandum of Law*, Michael Fuqua, as receiver (the “Receiver”) for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc., by and through his undersigned counsel, will move the Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, for an Order (a) further extending the stay provided for in paragraph 4 of the *Order Appointing Michael Fuqua as Receiver* (Doc. 117) (the “Receivership Order”); and (b) granting such further relief as is appropriate.

**PLEASE TAKE FURTHER NOTICE** that copies of the *Memorandum of Law* and supporting Declarations can be obtained (i) for a fee through the Court’s website at <https://www.nysb.uscourts.gov/> referencing Case No. 21 Civ. 6995 (PKC) or (ii) for free upon request directed to counsel for the Receiver, Reed Smith LLP, 1201 N. Market Street, Suite 1500, Wilmington, Delaware 19801, Attn: Jason D. Angelo, Esq. ([jangelo@reedsmith.com](mailto:jangelo@reedsmith.com)).

**PLEASE TAKE FURTHER NOTICE** that pursuant to paragraph 15 of the Receivership Order, Federal Rule of Civil Procedure 6(d), and Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposing affidavits and answering memoranda must be filed on or before July 7, 2022.

Dated: July 1, 2022  
New York, New York

Respectfully submitted,

REED SMITH LLP

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- and -

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*Counsel for Michael Fuqua, in his capacity as  
Receiver of Theia Group, Inc., Theia Aviation LLC,  
and Theia Holdings A, Inc.*